

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

PERCY GREEN, III, et al.,)	
)	
Plaintiffs,)	
)	Cause No. 4:15-CV-1433-RWS
v.)	
)	
CITY OF ST. LOUIS,)	
)	
Defendant.)	

MOTION TO INTERVENE

COMES NOW movant, the St. Louis Fire Fighters Association-International Association of Fire Fighters Local 73 (“Local 73”), and pursuant to Rules 24(a) and (b) of the Federal Rules of Civil Procedure, moves to intervene in this case as of right or, in the alternative, by permissive intervention.

Plaintiffs bring claims of racial discrimination regarding the promotional testing and ranking systems used by the City of St. Louis Fire Department. The movant, Local 73, is the certified bargaining representative of all firefighters and fire captains in the City of St. Louis Fire Department and has a direct interest in this litigation. The movant’s interests are not fully protected by the existing parties and, as such, Local 73 respectfully requests that this Court grant this motion and allow Local 73 to intervene in this action. In support of this motion, movant refers this Court to the concurrently filed memorandum.

Counsel for Local 73 has contacted counsel for both plaintiffs and defendant and neither objects to Local 73’s intervention.

Respectfully submitted,

HAMMOND AND SHINNERS, P.C.
7730 Carondelet, Suite 200
St. Louis, Missouri 63105
Phone: (314) 727-1015
Fax: (314) 727-6804

/s/ Nathan K. Gilbert
GREG A. CAMPBELL, #35381MO
SHERRIE A. HALL, #40949MO
NATHAN K. GILBERT, #68093MO

Attorneys for Intervenors

CERTIFICATE OF SERVICE

I hereby certify that on March 18, 2016, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the parties.

/s/ Nathan K. Gilbert